

Nicholas J. Henderson, OSB No. 074027
nhenderson@portlaw.com
Motschenbacher and Blattner LLP
117 SW Taylor Street, Suite 300
Portland, OR 97204
Phone: 503-417-0500
Fax: 503-417-0501

David Richardson, OSB 051370
david@pdxlawgroup.com
PDX LAW GROUP PC
121 SW Morrison St., Ste. 1520
Portland, OR 97204
(ph) 503-546-0141

Attorneys for Plaintiff

UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
PORTLAND DIVISION

ANGELA TORRES, an individual,

Plaintiff,

v.

ALIREZA ZAMANIZADEH, a/k/a ALI
ZAMANI, an individual, and ADULT CARE
SEARCH, a foreign non-profit corporation,

Defendants.

Case No.: 3:17-CV-01270-AC

JOINT STATUS REPORT

As requested by the Court, Plaintiff submits this Joint Status report:

The parties were unsuccessful in their efforts to reach a settlement. As a result, Plaintiff is prepared to move forward with the case. Plaintiff requests that the case be removed from abatement, so that the case can proceed to trial.

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The parties have conferred regarding case scheduling. The parties were able to come to an agreement regarding the case schedule which is set forth on the attached Appendix A.

DATED this 15th day of March, 2019.

MOTSCHENBACHER & BLATTNER LLP

SUSSMAN SHANK LLP

By: /s/ Nicholas J. Henderson
Nicholas J. Henderson, OSB No. 074027
Email: nhenderson@portlaw.com
Motschenbacher & Blattner LLP
117 SW Taylor Street, Suite 300
Portland, OR 97204
Telephone: (503) 417-0500
Facsimile: (503) 417-0501

By: /s/ Clifford S. Davidson
Clifford S. Davidson, OSB No. 125378
Email: cdavidson@sussmanshank.com
Sussman Shank LLP
1000 SW Broadway Ste 1400
Portland, OR 97205
Telephone: (503) 227-1111
Facsimile: (503) 248-0130

and

PDX LAW GROUP P.C.

Attorneys for Defendants Alireza
Zamanizadeh and Adult Care Search

By: /s/ David Richardson
David Richardson, OSB No. 051370
Email: david@pdxlawgroup.com
PDX Law Group P.C.
121 SW Morrison, Suite 1520
Portland, OR 97204
(971) 271-7450 (Office)
(503) 536-6843 (Fax)

Attorneys for Plaintiff Angela Torres

APPENDIX A

Dates:	Event:
5/30/2019	Last Day to Amend Pleadings and Add Parties
9/30/2019	Close of Fact Discovery
10/30/2019	Initial Expert Disclosures and Reports Due
11/30/2019	Rebuttal Expert Reports Due
12/15/2019	Close of Expert Discovery
12/30/2019	Last Day to File Dispositive Motions
30 days after Court's resolution of dispositive motions	Joint ADR report due:
60 days after Court's resolution of all pending dispositive motions	Last Day to File Joint Proposed Pretrial Order; Pretrial Motions; Motions <i>in Limine</i>
TBD (based on Court's availability)	Pretrial Conference
4/1/2020, or the closest date thereto that the Court is available.	Trial

CERTIFICATE OF SERVICE

The undersigned hereby certify that on March 15, 2019 a copy of the foregoing **JOINT STATUS REPORT** was filed electronically. Notice of this filing will be sent to the following parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's electronic filing.

- **Clifford S. Davidson** cdavidson@sussmanshank.com,clifford-davidson9403@ecf.pacerpro.com,jlanglois@sussmanshank.com
- **David W. Richardson** david@pdxlawgroup.com

The undersigned further certifies that a true copy of the foregoing was served on the following parties via First Class, U.S. Mail, postage prepaid, on above date:

None.

s/ Nicholas J. Henderson
Nicholas J. Henderson, OSB #074027
Of Attorneys for Plaintiff